

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

MALCOLM A. SMITH,  
DANIEL J. HALLORAN,  
VINCENT TABONE,  
JOSEPH J. SAVINO,  
NORAMIE JASMIN,  
JOSEPH DESMARET,

Defendants.

Case No. 7:13-CR-00297-KMK-2

**DANIEL J. HALLORAN'S**  
**MOTION TO JOIN IN CO-**  
**DEFENDANTS' MOTIONS TO**  
**DISMISS AND TO SEEK**  
**PERMISSION TO FILE REPLY**  
**BRIEFS**

Defendant Daniel J. Halloran hereby moves to join in the motions to dismiss filed by defendant Malcolm Smith on September 3, 2013 and defendant Vincent Tabone on September 6, 2013. Mr. Halloran also respectfully seeks this Court's permission to file reply briefs, if appropriate, on all of the issues being litigated in those motions.

1. On April 18, 2013, the United States Attorney for the Southern District of New York filed a ten-count indictment against Mr. Halloran, Mr. Smith, Mr. Tabone, Joseph J. Savino, Noramie Jasmin, and Joseph Desmaret.
2. On August 6, 2013, Mr. Halloran filed a motion to dismiss.
3. On September 3, 2013, Mr. Smith filed a motion to dismiss. Mr. Halloran has reviewed Mr. Smith's motion.
4. Mr. Halloran has spoken with counsel for Mr. Tabone and has discussed the substance of Mr. Tabone's motion to dismiss. Mr. Halloran anticipates that Mr. Tabone will file his motion today.
5. Mr. Halloran respectfully moves to join in both Mr. Smith's and Mr. Tabone's motions.

6. Mr. Halloran also respectfully requests that the Court permit Mr. Halloran to file reply briefs to any opposition to those motions to dismiss.

Respectfully submitted,

/s/ John G. Mateus

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